2003 Issue III

CENTRAL REGION ENVIRONMENTAL NEWSLETTER

CENTRAL REGIONAL ENVIRONMENTAL OFFICE

US ARMY ENVIRONMENTAL CENTER

Environmental Compliance Teamwork Pays Big Dividends at Fort Polk Through Their Environmental Management System

By Carrie Henderson
Solid Waste Manager, Ft. Polk

The Joint Readiness Training Center and Fort Polk (Fort Polk) operate an integrated environmental compliance system under the auspices of an Environmental Management System through Environmental Compliance Officers (ECOs) at the unit/activity level. As required by Army Regulation 200-1, all Fort Polk activities have appointed Primary and Alternate ECOs for each company and shop with a focus on customer service in attaining environmental compliance in support of the installation mission. In this regard, Fort Polk uses a combination of mechanisms to assist installation organizations with pollution prevention; environmental management and compliance; sustainability initiatives; and management of the installation's environmental permits and programs.

The ECOs in each unit/activity and Environmental Customer Service Technicians (ECSTs), who are part of the installation environmental office, are integral in facilitating compliance with environmental requirements.

The ECOs attend a 40-hour training course that is designed to provide them with the knowledge and skills they need to handle common environmental issues that they will encounter and to be the environmental experts in their respective organizations. The duties and responsibilities of the unit and activity ECOs are widespread and include:

- Maintaining a safe work area and facility;

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Fort Polk's Environmental Customer Service Technician assists an Environmental Compliance Officer with hazardous material inventory and shelf-life extension. *Photo courtesy of Fort Polk.*

Tribal Relations Training Success

Pueblo of Acoma Sky City Dancers. *Photo by Jeremy Moore, BOR*

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In This Issue

Chief Commentary

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An Army of One

We all know what this means in the context of the Army's recruiting efforts. However, wearing my Department of Defense (DoD) Regional Environmental Coordinator (REC) hat I often see a different picture emerge as the Army and DoD attempt to engage in "outreach" to market the Range and Readiness Preservation Initiative (RRPI) to the Congress and other interested stakeholders. What I mean is that sometimes there are conflicting messages given out from different constituencies within the DoD. These different messages can lead to a questioning of DoD's credibility. For example, the Secretary of Defense and others in leadership positions have gone to great lengths to tell Congress and the American people that there are environmental "encroachment" issues that adversely impact our troops ability to train realistically. On a more local level, regulators and local representatives may be told that we can get by with complex "workarounds" and that there is no real degradation of readiness. It would be a rare event indeed for a local commander to admit that his unit can't meet its readiness requirements because of environmental restraints. If the DoD is going to move forward in addressing these issues there needs to be a consistent message, one voice, presented to the American people. People need to know the value of the "train as we fight" philosophy and the true cost of accommodating these "workarounds" to deal with environmental encroachment issues. These costs involve both dollar and operational costs. We need to better document such costs and be able to explain them to all of the stakeholders involved. Additionally, everyone within DoD needs to be tuned into the one voice concept. Anything else seriously calls to question the credibility of the DoD in its approach to these environmental challenges.

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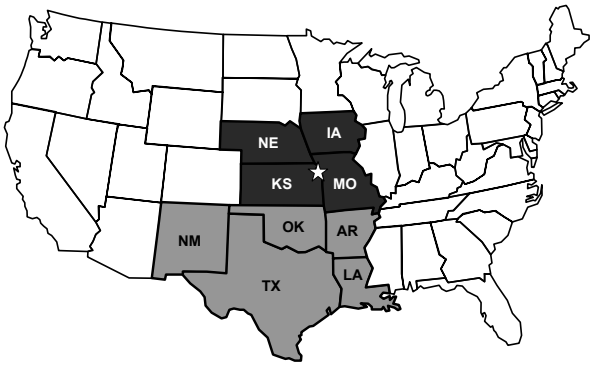
CREO Participation Calendar
DoD REC Region 7
Army RECs Regions 6 & 7

9/9-10	Southwest Strategy REC Meeting, Albuquerque, NM
9/22-26	New Mexico WQCC Hearing, Santa Fe, NM
10/16	Missouri Legislation Action Seminar, Lake Ozark, MO
10/6-8	Region 7 P2 Roundtable, Kansas City, KS
10/13-16	SWANA/DoD Solid Waste/ Recycling Workshop, St. Louis, MO
10/27-30	DoD REC Forum, Santa Fe, NM
11/4-6	Army Environmental Law Division BRAC Meeting, Arlington, VA
12/1-3	Army Governmental Affairs Conference, Washington, DC
12/9-10	Southwest Strategy REC Meeting, Phoenix, AZ
12/10-12	NSCL Fall Forum, Washington, DC
1/5-8	Sustainable Range Management Conference, New Orleans, LA



CREO Nine-State Area of Responsibility

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West Gate Construction at Fort Leonard Wood Observes Strict Environmental Guidelines

By Lisa Van Camp
Environmental Specialist, Ft. Leonard Wood

On May 30, 2003, a groundbreaking ceremony for the construction of the West Gate Entrance was held at Fort Leonard Wood (FLW). When looking out over the construction area, many pieces of heavy construction equipment could be seen at work building the roadway. What is not visible is the best management practices (BMPs) used by FLW to protect the environment during construction.

BMPs are state of the art methods used by FLW to mitigate adverse environmental impacts. The Environmental Division of the Directorate of Public Works has actively monitored the construction site to ensure that the contractor uses BMPs during construction in keeping with the "Pollution Prevention" concept. The primary objective of FLW's pollution prevention program is to reduce reliance on products and processes that are environmentally degrading and to come as close to "zero degradation" as possible.

Air quality is one element that FLW monitors closely under any circumstance. In fact, FLW has had an air quality management program in place for years and has implemented the required programs to maintain compliance during construction of the West Gate. In this instance, FLW has applied the use of an Air Curtain Destructor (ACD) to reduce air emissions caused by the burning of debris.

Storm water and erosion control using Rock Check Dams. INSET PHOTO: Debris dam temporary erosion control feature. *Photos Courtesy of Fort Leonard Wood*.

An ACD is an air pollution control device designed to increase burning efficiency, thereby reducing air emissions during open burning. The air pollution control system consists of an open pit at least 10 feet deep with the ACD on the rim of one side of the pit. A bulldozer moves the debris close to the pit and a trac-hoe picks up the debris and drops it in the pit. The airflow from the ACD is directed downward at a 30-degree angle over the pit distributing any unburned particles. Only woody vegetation, brush, tree limbs and tree trunks originating from the construction location are burned. Using an ACD provides FLW an affordable and environmentally friendly alternative to hauling debris to landfills.

Soil is another medium that is being monitored frequently. When completed, the access road will be approximately 4.5 miles in length across the installation. Care has been taken to minimize damage to the soil by petroleum products. There are established staging, maintenance and repair areas for heavy equipment such as drill rigs, backhoes and dump trucks. When the road is close to completion all disturbed areas outside the highway clear zone will be replanted with short-leaf pine seedlings and 13.5 acres of hardwood tree restoration will occur on site.

Temporary culverts to reduce water quality impacts. *Photo Courtesy of Fort Leonard Wood.*

In addition to soil management, FLW has installed storm water management measures on site. Storm water management is the mechanism for controlling runoff; reducing downstream erosion, water quality degradation, and flooding; and reducing the effects of land use on the aquatic environment. Permanent management features include sediment basins and rock ditch linings. Temporary features include the use of brush piles, debris dams, silt fences and straw bales. During the road planning stage, temporary culverts were installed to reduce the effects on water quality and aquatic life. Eventually a bridge will be constructed over the river as a permanent measure. The water is tested periodically to see if there are any changes to the water quality.

When completed, the West Gate will be a welcome addition to FLW. The use of BMPs during construction are a clear demonstration that practicing sound environmental stewardship is part of the Army's and Fort Leonard Wood's commitment to continual process improvement and prevention of pollution.

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Fort Riley Biologists' Extra Efforts Protects Sensitive Species and Supports Training Mission

By Michael Watson
Staff Writer, Ft. Riley Post

Wildlife biologists have one of the largest offices at Fort Riley -- more than 100,000 contiguous acres of tall grass prairie. Gibran Suleiman, Fort Riley threatened and endangered species biologist, said he spends a lot of time indoors working on his computer, but a fair amount of his time is spent in the field. "There is no better office than the outdoors, especially at Fort Riley," he said. "The tall grass prairie is one of the most endangered ecosystems in North America. There is more wildlife here than any other area in Kansas, because of its large, contiguous size and the management we do."

Because of Fort Riley's large size, the fish and wildlife staff stays plenty busy. "What I do on the Fort is just a fraction of the work load done by the staff of the fish and wildlife section. The staff that manages our game species and ponds does a tremendous amount of work. They really work their tails off," he said. Fort Riley is a part-time home to 223 species of birds, at least 42 species of reptiles and amphibians, 50 species of fish and at least 43 species of mammals.

Some of those are threatened or endangered species, Suleiman said. "My main responsibility is to keep the post in compliance with the Endangered Species Act, by advising the installation on ways to minimize its impacts on listed species." Therefore, when the installation undergoes some type of construction, the Conservation Division looks at the habitat that would be affected. If the area happens to be home to a threatened or endangered species, the Division would write up a biological assessment on how to minimize the impacts.

One of the threatened species that is monitored is the bald eagle. According to Suleiman, Fort Riley has one of the largest wintertime roosts for bald eagles in the nation, with more than 200 bald eagles annually. Three or four years ago, there were 300 to 400 eagles located in one roost. "One of my jobs is to help count them so we can monitor their migration. They are only here for the winter, from about October 15 to March 15," he said. "We also have to make sure that they are not disturbed because of noise. If there is a project near the roost, we find out if it is a project that can be put on hold. If it can't wait, then we advise the project's proponent on the best time to do the work."

Fort Riley threatened and endangered species biologist, preparing seine net to conduct fish census in streams on post. *Photo Courtesy of Fort Riley.*

Another endangered species, the Topeka Shiner, is alive and well at Fort Riley. Several years ago there were not very many of these fish on post, but the numbers have increased in the past few years. The U.S. Fish and Wildlife Service (USFWS) recently proposed to designate critical habitat status for the small fish in 186 stream segments in Kansas, Iowa, Minnesota, Nebraska and South Dakota. The USFWS did not propose to designate Fort Riley as critical habitat because management plans were already in place to protect the species. Fort Riley is one of only two entities to receive the proposed exemption. This type of proactive planning process contributes significantly to the sustainability of Fort Riley as an Army installation.

Suleiman said he loves protecting endangered species as well as finding new species. The installation has recently found new species of skinks and water snakes.

It is that strange wildlife that Suleiman said he finds most compelling, and it is that attitude that has him looking for one of Kansas' deadliest reptiles, the Timber Rattlesnake. While most people would never want to be within 20 feet of one, Suleiman said his goal is to catch one.

"We should have found a rattler on post by now -- we think they are here," he said. So, like a trophy hunter who goes after something rare and elusive, the trophy here is the Timber Rattler. "We know they are here, and we know they like brushy rock outcrops in the woodlands. To catch one, we just have to look in that type of habitat and start flipping cover."

Fort Bliss Begins UXO Cleanup on Castner Range

By Donita Kelley
Public Affairs Office, Ft. Bliss

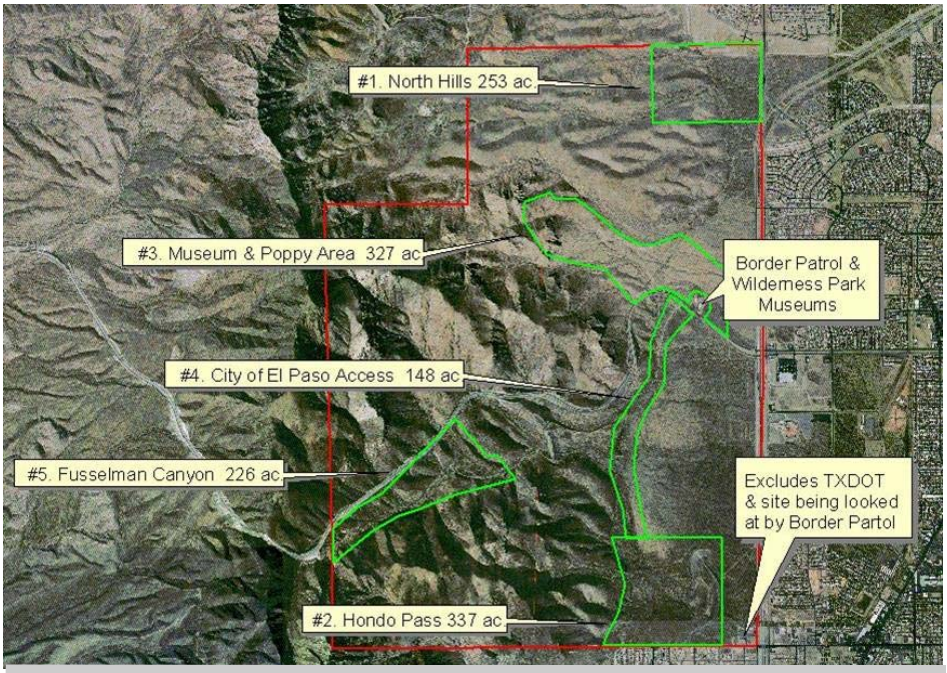
This past Spring El Paso families gathered in northeast Texas to once again get an up close look at the Mexican Poppies on Castner Range. Prime winter conditions resulted in an abundance of color. In addition to the poppies, plant species seldom found elsewhere in Texas grow in the unique soils that make up the alluvial fans of the lower elevations.

Although Castner Range is a beautiful area, it does have its hidden dangers. Many people who visited were not aware of, or did not pay attention to posted warning signs. Soldiers at Fort Bliss used Castner Range as a firing range from 1926-1966. During that time, Castner Range was located outside the city limits and literally hundreds of thousands of artillery shells, mortar rounds, rockets, grenades, landmines and other various weapons were fired there. Most of those items exploded; however, a small percentage did not. That small percentage of unexploded ordnance (UXO) is what concerns Fort Bliss officials.

UXO still presents a danger today. Although they may look relatively harmless, they can still explode if touched, moved or disturbed.

For safety reasons, Castner Range has been an "off-limits area" since its closure in 1966. No Trespassing signs are posted, both in English and in Spanish.

Clearing portions of Castner Range near North Hills sub-division. INSET. Two 81 mm practice mortar rounds. *Photos Courtesy of IRP Manager at Fort Bliss.*



Map of the areas to be cleaned up. *Photo Courtesy of Fort Bliss.*

Yet the serene beauty of the area still attracts hikers.

As the stewards of Castner Range, Fort Bliss personnel run public awareness campaigns about the hazards on Castner and coordinate any UXO cleanup. In July 2002, Fort Bliss officials announced that they had received $1.81 million to clear portions of Castner Range and that cleanup would begin in October of that year. However, the War on Terrorism and other missions pre-empted the process and the actual cleanup was not initiated.

But on June 30, 2003, UXO experts from USA Environmental initiated the largest cleanup of Castner Range since its closure. Field work is expected to last through January 2004. If additional funds are received, the cleanup can be extended.

The Castner Range cleanup includes approximately 1,291 acres in five specific areas known for their high possibility of trespassing (see map above). These areas include the areas adjacent to the North Hills housing, the area north of Hondo Pass, the poppy viewing area surrounding the El Paso Museum of Archaeology at Wilderness Park and the Border Patrol Museum, the City of El Paso's access road, and Fusselman Canyon.

Of the original 8,328 acres, only 1,761 acres have been cleared of UXO. The majority of this land was cleared in the 70's and turned over to the City of El Paso. This area includes where Castner Heights housing, Cohen Stadium, Walmart, Lowe's, and the two museums on Transmountain Road are now located.

Once cleared, Castner Range will remain off limits with no public access to the area. Under current Federal law, former firing ranges must be completely cleared of UXO before it can be turned over to the General Services Administration for disposal.

This means Fort Bliss personnel will continue to be good stewards of Castner Range. Fully aware that the beauty of the area is what attracts people to Castner Range, the publicity campaigns warning of the dangers will continue through the cleanup process.

Matters of Interest to All DoD Components

Legally Brief

Satellite Accumulation Areas at Your Installation - Understanding the Legal Requirements

By Stanley Rasmussen
CREO Regional Counsel

During my career, I have participated in many environmental audits at industrial installations throughout the United States. From this experience, I have found that many installations utilize "satellite accumulation areas" to save time and reduce expenses associated with hazardous waste management at the installation. However, I have also found that often these so-called satellite accumulation areas are not in compliance with applicable regulatory requirements and are actually illegal hazardous waste storage areas that could subject the installation to notices of violation fines, and penalties.

This installment of *Legally Brief* reviews the legal requirements of satellite accumulation areas and discusses additional issues concerning the proper use of these areas for hazardous waste accumulation.

Pursuant to 40 CFR Section 262.34(c), large quantity generators (LQGs) and small quantity generators (SQGs) are allowed to accumulate hazardous waste in satellite accumulation areas without complying with all of the generator accumulation provisions, or obtaining a RCRA permit or interim status. Generally, the benefit of this provision is that generators accumulating waste in satellite accumulation areas are not subject to regulatory requirements concerning waste accumulation periods (generally 90 days for LQGs and 180 days for SQGs), and are not required to obtain a permit to operate as a RCRA treatment, storage or disposal (TSD) facility.

Basic Requirements

The satellite accumulation provisions of 40 CFR 262.34(c) allow LQGs and SQGs to accumulate hazardous waste in containers if the following conditions are met:

- *The container must be at or near any point of generation where wastes initially accumulate*. It is important to note that the container must be placed at or near where the waste is generated. Generally this means that you **cannot** place a container in a central location at a facility, then bring waste to it from different places at the facility and meet the legal requirements of this provision.
- *The container must be under the control of the operator of the process generating the waste*. Note, more than one operator may have control of the container - for example, two employees generating lead waste on different work shifts at the same point of generation.
- *The container must comply with the provisions of 40 CFR Sections 265.171, 265.172, and 265.173(a) (see 40 CFR 262.34(c)(1)(i))*. These requirements include that generator ensure that the containers are in good condition, that the container is compatible with the waste, and that the containers are kept closed except when necessary to add or remove waste. In addition, if the container begins to leak the generator must transfer the waste to a container that is in good condition.
- *The container must be marked with the words "Hazardous Waste" or with other words that identify the contents of the container*.
- *Once 55 gallons of waste is accumulated in the satellite accumulation area container, you have 3 days to either dispose of the waste or move it to an appropriate hazardous waste accumulation area (i.e., a 90-day or 180-day accumulation area)*. Once you move the waste from the satellite accumulation area, the 90-day or 180-day time period for onsite waste accumulation commences.

Additional Issues

Following are some common questions the EPA has received concerning satellite accumulation areas. (Note, the EPA responses have been edited as necessary to accommodate this article.)

1. *Movement of Waste Between Satellite Accumulation Areas*

Question: If a facility has multiple satellite accumulation areas, can it move wastes from one satellite area to another satellite area?

Response: Waste cannot be moved between satellite accumulation areas. Once a waste leaves a satellite accumulation area, the waste should be destined for an accumulation area which is fully regulated under 40 CFR Sections 262.34 (a) or (d) (the 90 and 180-day requirements), or Parts 264 or 265 (generally applicable to TSD facilities). The regulatory requirements for satellite accumulation areas are designed to provide the generator with a safe and efficient manner to accumulate limited amounts of hazardous waste at or near the point of generation, prior to moving the waste to a fully regulated storage area. This eliminates the need to frequently move smaller quantities of hazardous waste within the generator's facility. It was not

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Improving Government-to-Government Relationships
Southwest Strategy Tribal Relations Training Success

By Jim Mayer
CREO/Versar, Inc. Project Manager
Member Southwest Strategy

Over 100 representatives from the (U. S. Department of Defense (Army, Navy, Air Force and Army Corps of Engineers) and 37 other federal and state agencies and tribal governments converged in Albuquerque, New Mexico, on July 21, 2003 to participate in the third South-

Pueblo of Acoma Sky City Dancers. *Photo by Jeremy Moore, Bureau of Reclamation.*

west Strategy (SWS) Mid-level Manager Tribal Relations Training course. The training was held at the Indian Pueblo Cultural Center in Albuquerque on July 21-24, 2003.

The SWS is a collaborative effort among federal, state, and tribal entities along with others to restore and enhance the cultural, economic and environmental quality of life in Arizona and New Mexico.

The SWS Tribal Relations Work Group (TRWG) focus is improving Government-to-Government relations concerning tribal lands and resources and other areas of mutual interest in Arizona and New Mexico by developing mutual trust, effective communication, and cooperative identification of solutions to common natural and cultural resource problems and issues. The TRWG also recommends and sponsors forums to address common issues on tribal lands and other areas of mutual interest.

The TRWG planned, coordinated and executed this four-day training course to provide information and techniques to build more effective relations among agencies and American Indian Tribes in Arizona and New Mexico. Training topics for the participants ranged from historical background, laws, regulations and executive orders, trust responsibilities and consultation to cultural sensitivity, tribal protocols and effective cross-cultural communication.

Students were educated by trainers representing leaders and managers from both federal and state agencies and tribal governments. The training contingent included such dignitaries as Everett Chavez (Governor - Santo Domingo Pueblo and Executive Director of the American Indian Science & Engineering Society), Arturo Senclair (Governor - Ysleta del Sur Pueblo), Vincent Randall (former Chairman - Yavapai Apache), Peter Pino (Tribal Administrator - Zia Pueblo), Arden Kucate (Councilman - Zuni Pueblo), and James R. Madalena (New Mexico State Legislature). Other respected and influential trainers included Arvin Trujillo (Director of Natural Resources - Navajo Nation), Arnold Taylor (Manager Department of Natural Resources - Hopi Tribe), Ben Nuvamsa (Superintendent - BIA Fort Apache Agency), Deborah Baptisto (Cultural Resources Specialist - Ak-Chin Indian Community), Joseph Joaquin (Cultural Affairs Specialist -

Arnold Taylor, Hopi Tribe, Senior Manager, Dept. of Natural Resources. *Photo by Jeremy Moore, Bureau of Reclamation.*

Tohono O'odahm Nation), Katherine Verburg (Solicitor - Department of Interior), and Ed Natay (Indian Trust Officer - National Park Service), among numerous others.

The SWS and all those in attendance were extremely grateful to have such a body of experienced individuals as trainers.

The training course was of great value

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Appreciative students. *Photo by Jeremy Moore, BOR.*

*(**Fort Polk** continued from page 1)*

- Complying with Pollution Prevention (P2) programs and recommending improvements;
- Managing solid waste, hazardous material, hazardous waste and used petroleum products;
- Training unit personnel on environmental issues;
- Managing environmental inspection reporting and record keeping programs;
- Preserving the Fort Polk training lands, endangered species, cultural resources and wetlands; and
- Advising the Commander of any environmental problems and legalities.

In addition to the ECOs, Fort Polk provides additional support for all units/activities through the ECST program. Each ECST is responsible for a major subordinate command or directorate. The ECSTs act as a liaison between the installation environmental office and the ECOs. Their focus is to provide customer support that encompasses all environmental requirements.

The ECSTs serve as a single point of contact for their assigned units. The ECSTs know the ECOs for each of their units/organizations and provide a non-threatening source of information about their environmental responsibilities. The duties of the ECSTs include:

- Maintaining a roster of current ECOs and having regular interaction with them;
- Responding to all environmental incidents for their assigned units (i.e., spills, releases, etc.);
- Assisting unit/activity in required quarterly inspections;
- Inspecting and maintaining oil-water separators at the wash racks in individual motor pools;
- Coordinating waste turn-in, including hazardous waste, solid waste, and scrap;
- Cross-leveling excess materials;
- Initiating orders for hazardous material from the hazardous material pharmacy, or HAZMART;
- Restocking the 15-day supply areas the each organization through the HAZMART;
- Assisting with shelf-life extension;
- Servicing parts-washer machines and distilling the solvent;
- Recycling organizations' antifreeze; and
- Ensuring unit awareness of environmental policies and procedures.

The ECSTs are the primary conduit for transferring environmental information to personnel on the installation. This feature enables ECSTs to implement Fort Polk's P2 program, long recognized as one of the premier programs in the Army, as well as to ensure compliance with environmental regulations. The P2 program operates under three main tenets:

- *A total systems program*. The P2 program involves not only the minimization of waste generation but also materials acquisitions, proper handling and use of materials, production activities, process management, waste management and disposal, which result in a cradle-to-grave approach.
- *Command emphasis*. Management involvement at all command levels is essential to the success of the program and is as important as a technology-based solution.
- *Waste management hierarchy*. Pollution prevention requires the use of the waste management hierarchy: using source reduction to prevent the creation of a waste is preferable to recycling or treating the waste after it is generated. Disposal is only implemented as a last resort.

The HAZMART is a key implementing organization for attaining the installation P2 goals and is instrumental in implementing a variety of P2 projects. The HAZMART has introduced many benefits to Fort Polk, including the free-issue of hazardous materials; MSDS support; material ordering, pickup, and delivery; hazardous material repackaging; tracking of material usage; shelf life extensions; provision of spill supplies; and antifreeze and solvent recycling. The HAZMART has had a cost avoidance of nearly $3,000,000 since its inception.

A ECO demonstrating proper parts washer use to shop staff as a ECST member observes. *Photo courtesy of Ft. Polk.*

The free-issue program is the cornerstone of the HAZMART success and has decreased the amount of wastes that require disposal. Excess items can be turned into the HAZMART where technicians at the pharmacy will determine whether the materials can be reused and will re-issue the materials for free to any unit that needs the particular item. The free-issue program has resulted in cost savings from decreased purchases of new hazardous materials and decreased disposal costs for hazardous and solid wastes. The ECSTs assist the unit ECOs with turn-ins as well as in determining whether they can use some of the free-issue materials.

Implementing a HAZMART-based antifreeze and solvent recycling program has drastically reduced the need for new solvent purchases and has all but eliminated disposal of this waste stream. The recycling program treats antifreeze and distills solvents for recycling and has decreased the need to purchase new antifreeze by 79%. Both the antifreeze and solvent recycling programs reuse empty containers, thus reducing both the purchase of new containers and the disposal of used containers.

The P2 initiative with the largest cost avoidance on the installation is the battery re-issue program. Fort Polk has established a program to reuse lithium batteries and to safely manage ones that cannot be reused as waste. Fort Polk has a facility dedicated to managing these batteries at the 8300 Block Consolidated

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Keep Texas Beautiful Announces Environmental Award Winners, Fort Bliss Wins First Place in Category

By Rosie Zarate
Outreach Coordinator,
Directorate of Environment, Ft. Bliss

Keep Texas Beautiful, Inc. (KTB) is a grassroots nonprofit organization that strives to empower Texans through education to take responsibility for enhancing their community environment. KTB works with volunteers, elected officials, business and state and federal agencies to ensure that every Texan has the opportunity to take individual responsibility for making Texas the cleanest, most beautiful state in the nation.

Awards granted by KTB recognize individuals and organizations for their commitment to litter prevention and cleanup, illegal dumping enforcement, solid waste management, beautification and community improvement. This year Fort Bliss was awarded first place in the "Government Award" category. This award is given to a government entity for their outstanding contribution to enhance their community environment. Representatives from Fort Bliss traveled to Dallas, Texas, on 10 July to accept the award. Colonel Dale A. Carr, P.E., Directorate of Public Works And Logistics, accepted the award on behalf of Fort Bliss.

Colonel Dale Carr accepting the First Place Award for Fort Bliss. *Photo courtesy of Fort Bliss Outreach Coordinator.*

***(Fort Polk** continued from page 8)*

Solid Waste Management Facility. All units are required to turn in their lithium batteries to the environmental personnel at the facility where personnel test each battery for its remaining charge. If the battery meets pre-established criteria, it will be re-issued, if not it will be managed in accordance with State and Federal regulations. This program results in a cost avoidance for Fort Polk in the amount of $750,000 each year.

The ECOs and ECSTs provide additional avenues to enhance environmental awareness and improve water quality at Fort Polk. The ECOs and ECSTs are also instrumental in implementing the Fort Polk storm water pollution prevention plan and spill prevention, control and countermeasures plan (SPCCP). ECSTs are involved with annual inspections for both the SWPPP and SPCCP, and with their in-depth knowledge of the units and activities at Fort Polk, provide valuable insight in determining areas in which to implement best management practices (BMPs). ECOs are involved with quarterly inspections for the SPCCP and implementing recommended BMPs. Through the ECST and ECO program, the installation is able to better implement the necessary practices for enhancing water quality into Fort Polk's daily routines.

Fort Polk's Air Quality Management team plays a vital role in the overall environmental compliance program. In this regard, Fort Polk operates its own water and wastewater treatment plants; fuel storage and dispensing facilities; surface coating and paint gun cleaning activities; external and internal combustion sources; degreasing and solvent reclaiming processes; and engine testing operations. Activities such as these are preformed in compliance with a Title V Operating Permit issued by the Louisiana Department of Environmental Quality. Fort Polk's Air Quality Management team supports the installation's Title V and Title VI programs by maintaining the required records, conducting emissions inventories, managing compliance reporting, and updating the Part 70 permit application as Army Transformation activities progress.

In addition to management of the Title V operating permit, the Air Quality Management team assists the installation in maintaining a balance between military readiness and environmental stewardship by reviewing short and long-term projects having a potential to impact air quality. These projects may include construction of new air emission sources, modification or demolition of existing sources, or other projects with a potential to impact air quality. Communication between the Air Quality Manager and project stakeholders throughout the design phase supports an effective Air Quality program and greatly reduces potential permitting delays. Effective communication between the installation environmental office and the stakeholders also ensures that pollution prevention and sustainable design concepts can be readily incorporated into each project.

The effectiveness of the compliance system at Fort Polk was demonstrated during their 2001 Environmental Compliance Assessment. Fort Polk received no findings in a military area, which was a first among Army installations. The installation hopes to repeat this performance during the upcoming Environmental Performance Assessment in September. By continuing to maintain environmental training, technical teams, technical representatives, leadership support, and material support facilities, Fort Polk will be able to remain an environmental compliance success story and at the same time provide very significant cost savings.

*(**Satellite Accumulation** continued from page 6)*
the EPA's intent to allow hazardous wastes to be moved from one satellite accumulation area to another. Furthermore, if waste is moved between satellite accumulation areas, this calls into question whether the waste is being stored in a satellite accumulation area "at or near the point of generation where wastes initially accumulate."

2. *Cabinets as Satellite Accumulation Areas*

Question: The satellite accumulation standards require that the containers be marked with the words "Hazardous Waste" or with other words that identify the contents of the container (40 CFR 262.34[c][1][ii]). If the generator has a satellite accumulation area that is located inside a cabinet, does a hazardous waste label placed on the outside of the cabinet fulfill the marking requirement, or must each individual container within the cabinet be labeled?

Response: Placing a label with the words "Hazardous Waste" on the outside of the cabinet may satisfy the satellite accumulation area marking requirements provided the cabinet meets the definition of container. A container is a portable device in which material is stored, transported, treated, disposed of, or otherwise handled (see 40 CFR 260.10). As a satellite accumulation area, the cabinet would have to be located at or near the point of generation and be under control of the operator of the process where the wastes are initially generated. In addition, the generator would have to maintain the cabinet in accordance with the container standards. These standards require that the cabinet be in good condition, be made of materials compatible with the waste that would be stored in it, and must always be closed during storage except when waste is being added or removed (40 CFR 262.34[c][1][I]). If the cabinet does not meet the definition of container and cannot be managed according to the applicable container standards, each individual container within the cabinet would need to be labeled and managed in accordance with all other satellite accumulation area requirements.

3. *Inspection of Satellite Accumulation Containers*

Question: A LQG that is accumulating hazardous waste on site for 90 days or less in containers must comply with 40 CFR Part 265, Subpart I (see 40 CFR 262.34[a][1][I]). Section 265.174 of Subpart I requires owners and operators to inspect containers weekly for leaks and deterioration caused by corrosion or other factors. Are LQGs required to inspect hazardous waste containers in satellite accumulation areas at or near the waste's point of generation in accordance with 40 CFR 262.34 (c)?

Response: Hazardous waste containers used to accumulate hazardous waste at or near any point of generation ("satellite accumulation") and in compliance with 40 CFR 262.34(c) are not required to be inspected weekly. 40 CFR Section 265.174, regarding weekly inspection, is not a requirement for containers of hazardous waste in a satellite accumulation area. Therefore, LQGs are not required to conduct a weekly inspection of containers in satellite accumulation areas so long as they comply with the provisions of 40 CFR 262.34(c). However, authorized states may require weekly inspection of containers in satellite accumulation areas, as states may have more stringent requirements than the federal regulations.

The use of satellite accumulation areas can assist installations in saving time and reducing expenses associated with hazardous waste management. However, you must ensure that you are properly complying with the legal requirements of the satellite accumulation area regulations. Accordingly, if your installation utilizes "satellite accumulation areas" for hazardous waste, it would be wise to review the regulatory requirements of 40 CFR 262.34(c) to ensure that you are in compliance with the applicable provisions of the regulations.

Upon completing your review, please feel free to contact me at stanley.l.rasmussen@usace.army.mil or (816) 983-3448 if you have any questions concerning the requirements of satellite accumulation areas. ☙

*(**Tribal Relations** continued from page 7)*
in clarifying an understanding of Government–to–Government relations as required by federal and state agencies to establish and further productive relationships with tribes, Pueblos, and Indian Nations. The highly experienced trainers demonstrated how effective communication and collaboration can be a key to the success of natural and cultural resource management and community development on federal, state, and tribal lands.

The principles established in the DoD's American Indian and Alaska Native Policy for interacting and working with federally-recognized American Indian and Alaska Native governments are based on tribal input, federal policy, treaties, and federal statutes. The DoD policy supports tribal self-governance and Government-to-Government relations between the federal government and tribes. Although these principles are intended to provide general guidance to DoD components on issues affecting tribes, DoD personnel must consider the unique qualities of individual tribes when applying these principles, particularly at the installation level.

This training course was of great value in emphasizing these principles that recognize the importance of increasing understanding and addressing tribal concerns, past, present, and future.

Additional information on the Southwest Strategy can be found on the Strategy's website at www.swstrategy.org. Information on the DoD's American Indians and Alaskan Natives policies and programs can be found at www.denix.osd.mil/denix/Public/Native/native.html.

(**Note:** The author represents the Army on the Southwest Strategy Tribal Relations Workgroup. Mr. Mayer is also the Workgroup's Training Coordinator and was responsible for planning and coordinating the SWS Tribal Relations training course. He can be reached at creo.project.manager@nwk02.usace.army.mil.)

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AEC Welcomes Incoming Executive Officer, LTC Houck

Lieutenant Colonel B.D. (Doug) Houck comes to USAEC from another OACSIM division, the Army Base Realignment and Closure Office. He is an engineer officer, receiving his commission from the United States Military Academy. His recent assignments include Deputy Facility Engineer, Defense Intelligence Agency; MACOM Engineer, US Army Criminal Investigation Command; MACOM Engineer, US Army Intelligence and Security Command; Executive Officer, 17th Engineer Battalion; and Deputy Facility Engineer, Multinational Force and Observers. LTC Houck's overseas assignments include six years in Germany and one year in Egypt.

Incoming AEC Command Counsel Begins Duties

Lieutenant Colonel Kenneth Tozzi assumed the duties of Command Counsel as of July 21. Most recently, he has been teaching environmental law to other attorneys and senior Army officers at the JAG School. Prior to teaching at the JAG school, LTC Tozzi was assigned to the Environmental Law Division where he worked on NEPA and BRAC issues.

LTC Tozzi was born in Trenton, New Jersey, and is a graduate of Rider College and Seton Hall University School of Law. He received a LLM degree in Environmental Law from George Washington University Law School in 1999. LTC Tozzi's previous assignments include Instructor, Department of Law, U.S. Military Academy, West Point, NY; Officer in Charge, Grafenwoehr Law Center, Grafenwoehr, Germany; and Professor and Vice-Chair, Administrative & Civil Law Department, U. S. Army Judge Advocate General's School, Charlottesville, Virginia.

New Garrison Commander at Fort Leonard Wood

Colonel James C. Abney was commissioned through the Reserve Officer Training Corps in 1981 and holds a BA from Furman University and an MS from the National Defense University and is a graduate of the Military Police Officer Basic and Advance Courses, the Combined Arms Service Staff School, the U.S. Army Command and General Staff College, the Industrial College of the Armed Forces and the FBI National Academy. Some of Col. Abney's CONUS assignments include: Commander 759th Military Police Battalion and Installation Provost Marshal Fort Carson, Colorado; and Deputy Director, Joint Security Directorate (FWD) USCENTCOM, Kingdom of Saudi Arabia. His most recent assignment was a board member for the Department of the Army Officer Special Review Board.

Change in Command at Iowa Army Ammunition Plant

On 9 July 2003, Lieutenant Colonel Rory Tegtmeier took command of Iowa Army Ammunition Plant. He is a graduate of Iowa State University where he earned a Bachelor of Science Degree in History in 1986. LTC Tegtmeier holds a Masters of Science Degree in Business Administration from Boston University.

Some of LTC Tegtmeier's CONUS and OCONUS assignments have included: Operations Desert Shield and Desert Storm; Brigade S-4, 501st Military Intelligence Brigade, Yongson, Korea; and logistics planner, Combined Forces Land Component Command (CFLCC), Operation Iraqi Freedom, Kuwait. LTC Tegtmeier's assignment prior to IAAP was as Division Chief, Operational Support Division, Operations Group – Delta, Battle Command Training Program at Ft. Leavenworth, Kansas.

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Mission: The CREO supports the Army and DoD mission through coordination, communication and facilitation of regional environmental activities. The Army REOs are part of a DoD network in which the Army, Air Force and Navy each has lead responsibility for mission implementation in the 10 Standard Federal regions. The CREO has DoD lead responsibility for Region 7 and Army lead responsibility for Regions 6 & 7.

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